

Darren P.B. Rumack (DR-2642)
THE KLEIN LAW GROUP
11 Broadway Suite 960
New York, NY 10004
Phone: 212-344-9022
Fax: 212-344-0301
Attorneys for Plaintiff.

EASTERN DISTRICT OF THE STATE OF NEW YORK

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JOSE ROLANDO LEON, *Individually and on behalf of others
similarly situated,*

Plaintiff

Case No. 16-cv-480 (KAM)(PK)

v.

NOTICE OF MOTION

**ZITA CHEN, Individually
and DNC DOORS & CABINETS INC.**

Defendants.

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PLEASE TAKE NOTICE that upon the annexed Declaration of Darren Rumack, sworn to on May 10, 2016, the exhibits annexed hereto, the Complaint herein, and all the pleadings and proceedings herein that Plaintiff Jose Rolando Leon will move this Court before the Honorable Judge Kiyo A. Matsumoto at the Courthouse located at 225 Cadman Plaza East, Brooklyn, New York 11201 on June 28, 2016 at 11:00 AM, or as soon thereafter as counsel can be heard for an order pursuant to Rule 55 of the Federal Rules of Civil Procedure granting a default judgment against Defendant Zita Chen and Defendant DNC Doors & Cabinets Inc. on all claims for relief in the Complaint, all attorney's fees and the costs and disbursements of this action and granting such other and further


relief as this Court deems just and proper.

Dated: New York, New York
May 10, 2016

Respectfully submitted,

The Klein Law Group P.C.

By:



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New York, NY 10004

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